

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

**Objection Deadline: December 28, 2020 at 4:00 p.m. (ET)**  
**Hearing Date: January 21, 2021 at 11:00 a.m. (ET)**

**NOTICE OF FOREIGN REPRESENTATIVE'S MOTION PURSUANT TO SECTIONS 105(A), 1507, 1521, AND 1525 OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 9006 FOR ENTRY OF AN ORDER (I) RECOGNIZING AND ENFORCING THE CDS EMPLOYEE FUND ORDER, (II) RECOGNIZING AND ENFORCING THE CDS CONTRACTOR FUND ORDER, AND (III) GRANTING RELATED RELIEF**

**PLEASE TAKE NOTICE** that on December 14, 2020, Cirque de Soleil Canada Inc., in its capacity as the authorized foreign representative (the “Foreign Representative”) of the above-captioned debtors (collectively, the “Debtors”), filed the *Motion Pursuant to Sections 105(A), 1507, 1521, and 1525 of the Bankruptcy Code and Bankruptcy Rule 9006 for Entry of an Order (I) Recognizing and Enforcing the CDS Employee Fund Order, (II) Recognizing and Enforcing the CDS Contractor Fund Order, and (III) Granting Related Relief* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801 (the “Bankruptcy Court”). A copy of the Motion is attached hereto as Exhibit A.

<sup>1</sup> The last four digits of Debtor CDS U.S. Holdings, Inc.’s tax identification number are (0086). Due to the large number of debtor entities in these chapter 15 cases, for which the Debtors have requested joint administration, a complete list of the debtor entities and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Debtors’ noticing agent at [www.omiagentsolutions.com/cirquedusoleil](http://www.omiagentsolutions.com/cirquedusoleil). The location of the Debtors’ service address for purposes of these chapter 15 cases is: 8400, 2e Avenue Montréal, Quebec H1Z 4M6 Canada.

**PLEASE TAKE FURTHER NOTICE** that any response or objection to the entry of the order with respect to the relief sought in the Motion must be filed with the Bankruptcy Court on or before **December 28, 2020 at 4:00 p.m. Eastern Time.**

**PLEASE TAKE FURTHER NOTICE** that at the same time, you must also serve a copy of the response or objection upon: (a) the Debtors, CDS U.S. Holdings, Inc., 5400 2e Avenue Montréal, Quebec H1Z 4M6 Canada, Attn: Jocelyn Côté; (b) counsel to the Foreign Representative, (i) Kirkland & Ellis LLP and Kirkland & Ellis International LLP, 601 Lexington Avenue, New York, New York 10022, Attn: Aparna Yenamandra; (ii) Kirkland & Ellis LLP and Kirkland & Ellis International LLP, 300 North LaSalle Street, Chicago, Illinois 60654, Attn: Chad J. Husnick, P.C., and (iii) Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, Wilmington, Delaware 19801, Attn: Laura Davis Jones and Timothy Cairns; and (c) the Office of The United States Trustee, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware 19801, Attn: Timothy Jay Fox, Jr.

**PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.**

**PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE RELIEF SOUGHT IN THE MOTION MAY BE HELD ON **JANUARY 21, 2021 AT 11:00 A.M. EASTERN TIME** BEFORE THE HONORABLE CHRISTOPHER S. SONTCHI, UNITED STATES BANKRUPTCY COURT JUDGE, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 5TH FLOOR, COURTROOM NO. 6, WILMINGTON, DELAWARE 19801.**

Dated: December 14, 2020  
Wilmington, Delaware

**PACHULSKI STANG ZIEHL & JONES LLP**

*/s/ Timothy P. Cairns*

---

Laura Davis Jones (DE Bar No. 2436)  
Timothy P. Cairns (DE Bar No. 4228)  
919 North Market Street, 17th Floor  
P.O. Box 8705  
Wilmington, Delaware 19899-8705 (Courier 19801)  
Telephone: (302) 652-4100  
Facsimile: (302) 652-4400  
Email: ljones@pszjlaw.com  
tcairns@pszjlaw.com

-and-

Aparna Yenamandra (admitted *pro hac vice*)  
**KIRKLAND & ELLIS LLP**  
**KIRKLAND & ELLIS INTERNATIONAL LLP**  
601 Lexington Avenue  
New York, New York 10022  
Telephone: (212) 446-4800  
Facsimile: (212) 446-4900  
Email: aparna.yenamandra@kirkland.com

-and-

Chad J. Husnick, P.C. (admitted *pro hac vice*)  
**KIRKLAND & ELLIS LLP**  
**KIRKLAND & ELLIS INTERNATIONAL LLP**  
300 North LaSalle Street  
Chicago, Illinois 60654  
Telephone: (312) 862-2000  
Facsimile: (312) 862-2200  
Email: chad.husnick@kirkland.com

*Counsel to the Foreign Representative*